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February 2, 2022

The Honorable Louis L. Stanton
United States District Court for the Southern District of New York
500 Pearl Street, Courtroom 21-C
New York, New York 10007

Re: *MV Realty, PBC, LLC, v. Innovatus Capital Partners, LLC* (1:18-cv-07142); *Innovatus v. Neuman et. al.* (1:18-cv-04252)

Dear Judge Stanton:

We write on behalf of MV Realty to respectfully request permission to file under seal portions of MV's February 1, 2022 letter. MV's letter refers to information from documents that have been designated by Innovatus "Confidential" under the Protective Order.

Although there is a presumption in favor of public access to judicial documents, a court may seal judicial documents if "closure is essential to preserve higher values and closure is narrowly tailored to serve that interest." *Lugosch v. Pyramid Co. of Onondaga*, 435 F.3d 110, 120 (2d Cir. 2006). The Protective Order provides: "Where any Confidential or Highly Confidential Materials, or Information derived therefrom, is included in any motion or other proceeding in this Proceeding, the Parties and any involved non-party shall follow the procedures outlined in Fed. R. Civ. P. 5.2, the Standing Order Regarding Electronic Filing Under Seal in Civil and Miscellaneous Cases dated December 19, 2019, and the Individual Rules of Practice issued by the Court, or any Standing Procedural Order subsequently issued by the Court." On June 1, 2021, the Court entered an Order in connection with Innovatus' request to seal certain portions of MV's May 24, 2021 letter, which provided further guidance regarding the standard for sealing. *See* Dkt. 171.

Accordingly, MV requests permission to file portions of its February 1, 2022 letter under seal, subject to Innovatus' position as to whether they should be sealed.

Sincerely,

s/ Jason C. Raofield
Jason C. Raofield

Denied.
Louis L.
Stanton
2/14/22



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February 9, 2022

VIA ECF

The Honorable Louis L. Stanton
United States District Court
Southern District of New York
Daniel Patrick Moynihan United State Courthouse
500 Pearl Street
New York, NY 10007

Re: *Innovatus Capital Partners, LLC v. Neuman*, No. 1:18-cv-04252-LLS (S.D.N.Y.)¹ and
MV Realty PBC, LLC v. Innovatus Capital Partners, LLC, No. 1:18-cv-07142-LLS
(S.D.N.Y.)

Dear Judge Stanton:

We write on behalf of Innovatus Capital Partners, LLC ("Innovatus") in response to the MV Realty Parties' letter request (Dkt. 283) to seal portions of their February 1, 2022 letter to the Court (the "Letter") (Dkt. 284).

Innovatus has reviewed the portions of the Letter proposed to be redacted by the MV Realty Parties and Innovatus does not seek sealed treatment of this information.

Respectfully,

A handwritten signature in black ink, appearing to read "Mi McGinley", written in a cursive, stylized script.

Michael H. McGinley

CC: All counsel of record (via ECF)

¹ All citations to "Dkt." herein refer to the docket entries in *Innovatus Capital Partners, LLC v. Neuman*, No. 1:18-cv-04252-LLS (S.D.N.Y.).